

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
EIBASS Petition for Rulemaking for)	
Revised Part 74 Remote Pickup)	RM-11649
Station Center Frequencies and Allowing)	
Digital Modulation for RPU Stations)	
)	
SBE Request for Temporary Rule Waiver)	RM-11648
to Allow Digital Modulation for RPU Stations)	
)	
Amendment of Part 74, Subpart D, of the)	ET Docket 01-75
Commission's Rules)	

To: The Commission

Comments of EIBASS

Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its comments in response to the Commission's December 21, 2011, Consumer and Government Affairs Bureau Report Number 2943, giving public notice of a Petition for Rulemaking filed by EIBASS on October 4, 2011, and of a Request for Waiver filed by the Society of Broadcast Engineers, Inc. (SBE) on November 7, 2011. The public notice assigned rule making (RM) numbers to both filings, and requested comments within 30 days, resulting in a January 20, 2012, comment deadline. Therefore, these EIBASS comments are timely filed.

I. EIBASS Petition for Rulemaking and SBE Waiver Request

1. The EIBASS Petition for Rulemaking asks the Commission to revise the allowable center frequencies for Part 74, Subpart D, Remote Pickup (RPU) stations; allow digital modulation for RPU stations; and update the RPU station identification rules to allow digital modulation using the "watermark" identification technique defined in Advanced Television Systems Committee (ATSC) Standard A/82.¹ The SBE filing asks the Commission to grant a blanket rule waiver to

¹ *Automatic Transmitter Power Control (ATPC) Data Return Link (DRL) Standard*, ATSC Document A/82, 11 February 2008. See <http://www.atsc.org/cms/index.php/standards/published-standards/61-atsc-a82-standard>.

RM-11649/RM-11648: Digital Modulation for RPU Stations and Other Changes to the Part 74 RPU Rules

allow RPU stations to use all forms of digital modulation, now possible using commercially and readily available digital two-way radios.

II. EIBASS Reiterates the Need for Updated RPU Rules, and Supports the SBE Request for a Blanket Rule Waiver Pending Modification of the RPU Rules

2. In the 108 days since EIBASS filed its Petition for Rulemaking, nothing has changed regarding the need to revise the allowable center frequencies for RPU stations, allow RPU stations to use digital modulation, and allow the “watermark” method of station identification (ID) defined in the ATSC A/82 DRL standard. The watermark station ID is intended to allow all parties to identify a digitally-modulated signal, without having to first know the digital modulation type or coding scheme. EIBASS supports the SBE request that the Commission grant a temporary, blanket, rule waiver to allow RPU stations to immediately start using now commercially available Land Mobile digital radios, pending the completion of this proceeding.

III. Summary

3. EIBASS urges the Commission to advance to the next step in the rulemaking process, and issue a Notice of Proposed Rulemaking to amend the Part 74 RPU rules.

Respectfully submitted,

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